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Public Disclosure  
Commission

**Formal Complaint to the Washington State Public Disclosure Commission  
Relating to an Elected Official or Candidate for Public Office**

Name of Official or Candidate: Dennis P. Hession  
Address of Official or Candidate: P.O. Box 31312  
Official's or Candidate's Spokane WA  
City State Zip Code  
Official's or Candidate's Telephone: (509) 838-5111 / (509) 844-2657  
(Include Area Code)  
Official's or Candidate's E-Mail Address: HESSION1@GMAIL.COM  
(If known)  
Your signature: Donna L. McKereghan  
Your printed name: Donna L. McKereghan  
Street address: 709 E. Indiana Ave.  
City, state and zip code: Spokane, WA 99207  
Telephone number: (509) 484-9282  
E-Mail Address: (Optional) mckereghan@comcast.net  
Date Signed: 1/19/07  
Place Signed (City and County): Spokane Spokane  
City County

**Complaint: (Attach Complaint and Certification)**

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**Certification for a  
Complaint to the Washington State Public Disclosure Commission Relating to an  
Elected Official or Candidate for Public Office  
(Notary Not Required)**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the facts set forth in this attached complaint are true and correct.

Your signature: Donna L. McKereghan

Your printed name: Donna L. McKereghan

Street address: 709 E. Indiana Ave.

City, state and zip code: Spokane, WA 99207

Telephone number: (509) 484-9282

E-Mail Address: (Optional) mckereghan@comcast.net

Date Signed: 1/19/07

Place Signed (City and County): Spokane Spokane  
City County

\*RCW 9A.72.040 provides that: "(1) A person is guilty of false swearing if he makes a false statement, which he knows to be false, under an oath required or authorized by law. (2) False swearing is a misdemeanor."

COMPLAINT ATTACHED

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Donna L McKereghan  
709 E. Indiana Ave.  
Spokane, WA 99207  
January 19, 2007

Public Disclosure Commission  
711 Capitol Way #206  
PO Box 40908  
Olympia, WA 98504-0908

Dear Members of the Public Disclosure Commission,

On June 8, 2006, Dennis P. Hession filed with the PDC that he was running in the November 2007 election for Mayor of Spokane. Since that time, he has filed several reports with the PDC that have been late, not only by a day or two but by months. Additionally, these reports indicate that he has not deposited campaign contributions in the manner required by law.

In particular:

Date on report	Contribution Dates Listed	Deposit Date Listed
7-11-05	6-7-05	6-7-05
12-11-06	6-4-06; 6-12-06; 6-22-06; 5-31-06	7-17-06
12-11-06	5-22-06; 5-24-06; 5-25-06;	6-22-06
12-19-06	11-25-06; 12-1-06	12-11-06

As well, in an expenditure report dated December 11, 2006, he reports expenditures from September 27, 2006, one of them in the amount of \$1,762.54. In a report filed with the PDC on December 11, 2006 he reports an expenditure from July 17, 2006.

Mr. Hession has been found in violation of PDC regulations before – in May of 2004. That ruling included the suspension of half of the fine, as long as he did not re-offend within two years. The contribution report that is dated July, 2005 for contributions he received and deposited on June 7, 2005, constitutes a re-offense within that time period.

More importantly, he has violated PDC filing requirements numerous times in 2006. These include accepting a campaign contribution on May 22, 2006 but not filing as a candidate until June 8, 2006; numerous contributions that were not deposited within the time required by PDC rules; and reporting that is not late by a few days but, rather, by months.

In a report dated July 11, 2005, he reports that on July 7 and July 14 of 2004, he paid his \$100.00 fine from the PDC in two payments made from campaign funds. I do not know whether paying PDC fines from campaign funds is legal. However, given a campaign that runs into the tens of thousands of dollars, such a fine may be considered a small expense if, for reasons of political strategy, a candidate intentionally files late reports of information so that it is not available to the

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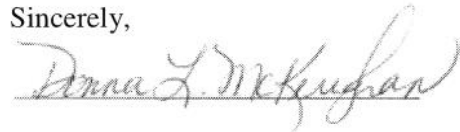
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public until the candidate wishes to reveal it. Repeated offenses by candidates who have been clearly advised by the PDC in the past makes the lateness of these reports all the more suspect to the public.

In the interest of full disclosure, I am the individual who filed the complaint against Mr. Hession in 2004. I use PDC reports to supplement the information I am able to obtain on candidates in the process of making my decisions about how to vote. I am also a member of the Legislative Ethics Board, a member of the Council on Governmental Ethics Laws, and have filed as a candidate for City Council, in my district. Further, I am currently the plaintiff in litigation pending in the Eastern U.S. District Court against the City of Spokane, which names our Deputy Mayor, but does not name Mr. Hession, as I am not aware that he has any involvement in the matter.

The fact that I was the individual who filed the previous complaint against Mr. Hession indicates that my motive is not related to the litigation, filed over a year later. My activities are indicative of my values, which prioritize ethics in government. Of course, regardless of the motivation of the complainant, the question before you is whether Mr. Hession is in violation of PDC laws. I can only say that I would have preferred not to find myself in the position of needing to bring these violations to your attention as a complaint, yet again.

Sincerely,

A handwritten signature in cursive script, reading "Donna L. McKughan". The signature is written in dark ink and is positioned below the word "Sincerely,".